



Joshua N. Pila  
General Counsel  
Local Media Group  
T 404-327-3286  
Joshua.pila@meredith.com

January 28, 2019

**VIA ECFS**

Marlene Dortch  
Secretary  
Federal Communications Commission  
12th Street, SW  
Washington, DC 20554

RE: Comments on NAB/NCTA Joint Proposal (MB Docket No. 17-317)

Dear Ms. Dortch,

Meredith Corporation's Local Media Group ("Meredith") hereby SUPPORTS the joint proposal of NAB and NCTA regarding the Commission's retransmission consent election process as outlined in that certain Public Notice dated December 13, 2018 in the above-referenced docket (the "Compromise"). Meredith commends NAB and NCTA for their efforts to reach this common sense, easily applied, Twenty-First Century proposal and hopes it can be put into place for the 2020 election cycle for all MVPDs (including DBS). Specifically, Meredith supports limiting sent notices to election changes, utilizing online systems, and requiring up-to-date contact information.

First, limiting the requirement to send election notices to instances of a change of election will greatly reduce the time required of both MVPDs and broadcasters. Hundreds of letters will become handfals. It also reduces the opportunity for "gotcha" gamesmanship because a retrans station stays a retrans station (and vice versa) absent affirmative choice by the broadcaster. Adding letters to a public file is much less onerous, and as noted in the Compromise ex parte attached to the Public Notice, would be governed by public file rules and not a draconian three-year consequence.

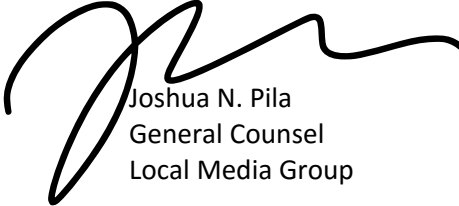
Second, the election process is ready for the Twenty-First Century. In the last election cycle, Meredith sent several hundred paper election notices by certified mail. Certified mail is expensive and slow, as are the human-hours spent labeling, stuffing, and tracking the certified mail paper documents. Delivery took days, or even weeks, and could be held up by someone refusing to or not being available to sign the card. In contrast, the Compromise wisely utilizes electronic systems - e-mail, COALS, and the Commission's online public file systems.

Third, Meredith especially supports the requirement that MVPDs list up-to-date contact information in COALS and the public inspection file. In the past election cycle, Meredith spent a great deal of time researching from a variety of sources and dealing with changed addresses, new contact people, or similar contact information issues due to the lack of a single location to find up-to-date contacts. Similarly, the CC to a FCC email address and auto-response functionality will provide certainty missing in the certified mail process.

Finally, to the extent that DBS providers may claim that the current election rules for DBS do not burden the parties because there are only two DBS providers, Meredith reiterates that the Compromise should apply to all MVPDs. The inefficiency of certified mail and the internal mailroom workings of the large multi-faceted DBS conglomerates adds unnecessary delay, confusion, and opportunity for gamesmanship to the process. Furthermore, using a different regime for two MVPDs would confuse smaller stations and new entrants.

In sum, the Compromise offers a well-reasoned, technologically sound, and far more reasonable means of implementing the retransmission consent/must-carry election cycle. The only losers are entities that try to game the election process by changing addresses, refusing to accept mail, or otherwise. That's why both NAB and NCTA support the Compromise. So does Meredith.

Very Truly Yours,



Joshua N. Pila  
General Counsel  
Local Media Group